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14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL WAYMO TO
SUPPLEMENT RFA &
INTERROGATORY RESPONSES AND
TO PRODUCE UNREDACTED
DOCUMENT**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

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28 UBER'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS TO THEIR MOTION TO COMPEL
WAYMO TO SUPPLEMENT RFA & INTERROGATORY RESPONSES AND TO PRODUCE UNREDACTED
DOCUMENT

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this Administrative Motion to File under Seal Exhibits to Uber’s Motion to Compel Waymo to Supplement RFA & Interrogatory Responses and to Produce Unredacted Document. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief to Compel RFA& Interrogatory Responses (“Letter Brief”)	Highlighted Portions	Plaintiff
Exhibit 1 to the Pritt Declaration ISO Letter Brief to Compel RFA& Interrogatory Responses (“Pritt Declaration”)	Entire Document	Plaintiff
Exhibit 2 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 3 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 7 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 8 to the Pritt Declaration	Entire Document	Plaintiff

The highlighted portions of the Letter Brief and the entirety of Exhibits 1, 2, 3, 5, 6, 7, and 8, contain information that I understand Waymo designated or may consider to be “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order in this case. (See Pritt Decl. ¶ 3.) Uber’s request is narrowly tailored to information Waymo designated and considers “Highly Confidential—Attorneys’ Eyes Only” under the Protective Order, or asked to be sealed. (Pritt Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on August 31, 2017.

1 Dated: August 31, 2017

BOIES SCHILLER FLEXNER LLP

2 By: /s/ Karen L. Dunn

3 Karen L. Dunn

4 *Counsel for Defendants*
5 UBER TECHNOLOGIES, INC. AND
6 OTTOMOTTO LLC